

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FT. WORTH DIVISION**

JAMES JOSEPH JULUKE, JR.,                     )  
an individual,                                     )  
                                                           )  
                  Plaintiff,                             )  
v.                                                     )  
                                                           )  
INLAND WESTERN NORTH                     )  
RICHLAND HILLS DAVIS LP, LLC,             )  
a Delaware Limited Liability Company,     )  
                                                           )  
                  Defendant.                        )  
\_\_\_\_\_  
                                                           )

Case No.: 4:13-cv-00791-O

**PLAINTIFF’S INITIAL DESIGNATION OF EXPERT**

Pursuant to the Scheduling Order (Dkt. 8) entered by the Court on November 5, 2013 and the Amended Scheduling Order (Dkt. 12) entered by the Court on February 10, 2014, Plaintiff James Joseph Juluke, Jr. (“Plaintiff”), by and through undersigned counsel, hereby discloses its list of expert witnesses that he may call or will call at trial. As discovery in this matter is ongoing, Plaintiff reserves the right to supplement or modify this disclosure as permitted under Federal and Local rules.

1. Nicholas Heybeck: 18406 Lost Maples CT, Humble, TX 77346. This witness has been retained by the Plaintiff for his expert opinion testimony regarding the existence of alleged barriers to access, the appropriate methods of barrier removal of said barriers, the cost of said barrier removal and whether said barrier removal is readily achievable and/or technically feasible to accomplish.

Date: May 7, 2014

Respectfully Submitted,

KU & MUSSMAN, P.A.

By: /s/ Louis I. Mussman.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

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